



Advancing Standards of Excellence in Real Estate

November 8, 2010

The Honorable Lisa Jackson
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20004

Dear Administrator Jackson:

On behalf of the 4,700 members of the Richmond Association of REALTORS® (RAR), I am submitting comments regarding the proposed rule issued by the Environmental Protection Agency (EPA) on establishing a Total Maximum Daily Load (TMDL) for states in the Chesapeake Bay Watershed.

RAR is strongly supportive of the efforts to restore and protect the Chesapeake Bay and its tributaries. However, RAR has serious reservations about some of the proposals and their benefits as opposed to the costs they will impose on homeowners as well as state and local governments. RAR urges the EPA to delay implementation of the TMDL and backstops for at least one year.

Of particular concern to our industry are the urban and suburban stormwater retrofits that would be required of existing properties, including state and local highways. It will be extremely costly for existing developments to install the required stormwater controls and the benefits to be gained by these expensive retrofits do not justify the costs. In addition, requiring retrofits on existing infrastructure such as roads and parking lots will be extremely costly for the government and businesses and very disruptive to the community.

RAR appreciates the EPA's efforts to improve the health of the Bay, but we urge you to slow the process down and truly calculate the costs of the TMDL compliance on local governments, businesses, and citizens in the areas that are already struggling with unemployment, foreclosures and shrinking budgets. Thank you for your consideration of these important issues.

Sincerely,

Elizabeth Hancock Greenfield
Director of Government Affairs

